

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANTHONY GOTTLIEB, Trustee of the NITA STRICKLAND BUSH ESTATE TRUST and Administrator of BURNING BUSH MUSIC,	:	
	:	Case No.: 07 C 6843
Plaintiffs,	:	
v.	:	Hon. Joan B. Gottschall Magistrate Judge Geraldine Soat Brown
DDB CHICAGO, INC., and CAPITAL ONE FINANCIAL CORPORATION,	:	
	:	
Defendants.	:	
	:	
	:	

AGREED MOTION FOR CONFIDENTIALITY AND PROTECTIVE ORDER

NOW COMES Plaintiff, Anthony Gottlieb, (“Gottlieb”), by his attorney, William L. Niro, and Defendants DDB Chicago, Inc. and Capital One Financial Corp., by its attorney, Ronald Y. Rothstein to respectfully request this court to enter this Agreed Confidentiality and Protective Order. The grounds in Support of this Motion are as follows:

1. DDB Chicago, Inc. provides advertising concepts and material for its clients for use over mediums such as television, radio, and newsprint. Capital One Bank, a subsidiary of Capital One Financial Corp., is a client of DDB Chicago, Inc. whom DDB Chicago, Inc. has produced television commercials for.
2. This case involves Defendants’ advertising practices, which are alleged to violate the Copyright Act of 1976, 17 U.S.C. § 101, *et seq.* (See Complaint, ¶¶ 18-32).

3. Discovery in this case will necessarily involve facts relating to the parties' trade secrets and confidential and sensitive business, financial, and marketing data and information.

4. In the course of this case, the parties will propound discovery that likely will require the parties to divulge their trade secrets and confidential and sensitive business, financial, and marketing data and information.

5. The Agreed Confidentiality and Protective Order attached hereto is drawn to only protect what may constitute legitimate trade secret and confidential business information.

Dated: April 1, 2008

/s/ Ronald Y. Rothstein
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that he caused a true and correct copy of the attached **Agreed Motion for Confidentiality and Protective Order** to be served on the following via electronic and messenger.

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